

- UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

5. On or around July 11, 2022, Mammoth Tech's former counsel entered an Appearance in the above-captioned matter and filed an Objection to the Motion for Default. [Dock. Nos. 18, 19.]

6. On or around July 12, 2022, the Court granted Mammoth Tech's Objection to the Motion for Default and set Mammoth Tech's deadline to file a response to ZJBV's First Set of Interrogatories as August 2, 2022.

7. At this time, ZJBV awaits interrogatory responses from Mammoth Tech, which Mammoth Tech has stated will be provided on August 2, 2022.

8. The current discovery deadline is set for August 15, 2022. However, the Parties have discussed extending the discovery deadline to allow the Parties an opportunity to conduct meaningful discovery.

9. Accordingly, the Parties intend to prepare and file a Motion to Extend Case Deadlines, which will extend the mediation, discovery, and trial deadlines in the above-captioned matter.

Dated: July 28, 2022

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Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that on this 28th day of July, 2022, I provided a true and exact copy of the foregoing to all counsel of record.

/s/ Hilary Holmes Rheaume, Esq.

Hilary Holmes Rheaume, Esq.